

FILED  
U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

ROBERTA SHANK AND BILL SHANK  
D/B/A CHIEF'S JANITORIAL,

PLAINTIFFS,

VS.

ALLEN HORAK, DEPARTMENT OF  
ROADS, DISTRICT 4 OPERATIONS AND  
MAINTENANCE MANAGER, INDIVIDUALLY  
AND ALAN GALAWAY, NEBRASKA  
DEPARTMENT OF ROADS,  
MAINTENANCE MANAGER, INDIVIDUALLY,

DEFENDANTS.

CASE NO. 4:06-CV3253

**PROTECTIVE ORDER**

This matter comes on for consideration of the joint stipulation of the parties for a protective order, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure. The Court, being fully advised, finds that an Order should be entered in accordance with the stipulation. It is therefore ordered as follows:

1. Any personnel file(s), and/or any information or record of any employee(s) contained therein, which is provided to plaintiff's attorney pursuant to plaintiff's discovery requests or subpoenas in this matter shall be considered "confidential".

2. The information designated as "confidential" under this stipulation, to the extent that it is disclosed, given or produced by defendant(s) to plaintiff's attorney during the pendency of this action, shall be used solely for preparation for and use in this litigation and shall not be used or disclosed by any person receiving such information for any other purposes whatsoever.

3. Plaintiffs' attorney shall maintain the confidentiality of all documents subject to this stipulation. Access to confidential items shall be restricted to plaintiffs' attorney, attorney's paralegals and secretarial staff, and plaintiffs' experts. Prior to receiving access to any confidential items, each of the persons identified above, with the exception of plaintiff's attorney, shall agree in writing to be bound by the terms of this stipulation, and a copy of such agreement furnished to defendants' counsel.

4. On final determination of this action, plaintiffs' counsel shall assemble and return to the defendant(s) all documents, copies thereof, or other records of confidential information protected by this stipulation.

Dated this 30<sup>th</sup> day of July, 2007

BY THE COURT:

/s/ David L. Piester  
David L. Piester  
United States Magistrate Judge

Prepared by:

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